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Counsel for Jeffrey Wertkin

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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UNITED STATES OF AMERICA,) No. 17-MJ-70131 (LB)
Plaintiff,)
v.)
JEFFREY WERTKIN,)
Defendant.)

Jeffrey Wertkin and the United States Attorney's Office for the Northern District
of California, by and through their respective undersigned counsel, hereby stipulate
STIPULATION AND [PROPOSED] ORDER RE TRAVEL
United States v. Jeffrey Wertkin, No. 17-MJ-70131 (LB) 1

1 and agree as follows:

2 The Court admitted Mr. Wertkin to pretrial release under certain conditions. Dkt.
3 4. One such condition was that Mr. Wertkin not travel outside of certain specified
4 districts. *Id.* Mr. Wertkin's family has planned travel to the District of West Virginia with
5 members of his extended family between July 1 and July 9, 2017.

6 Undersigned counsel for Mr. Wertkin spoke with Mr. Wertkin's Pretrial Services
7 Officer, Ladreena Walton, who stated that her office has no objection to Mr. Wertkin
8 seeking leave of Court to travel to West Virginia for purposes of this family travel.

9 Accordingly, the parties stipulate and agree that the conditions of Mr. Wertkin's
10 pretrial release should be modified to permit him to travel to the District of West Virginia
11 between July 1 and July 9, 2017.

12 SO STIPULATED:

13 Dated: May 26, 2017

BRIAN J. STRETCH
United States Attorney

14
15 By: _____ /s/
Robin Harris
16 Assistant United States Attorney

17 Dated: May 26, 2017

18 By: _____ /s/
Raphael M. Goldman
19 ARGUEDAS, CASSMAN & HEADLEY, LLP

Counsel for Jeffrey Wertkin

21 **[PROPOSED] ORDER**

22 Pursuant to the parties' stipulation, IT IS SO ORDERED.

23 Dated: _____

24 By: _____
The Honorable Laurel Beeler
25 United States Magistrate Court Judge

26
27
28 **STIPULATION AND [PROPOSED] ORDER RE TRAVEL**

United States v. Jeffrey Wertkin, No. 17-MJ-70131 (LB) 2